

# **Exhibit C**

**From:** Nemelka, Michael N.  
**To:** Dan Hedlund; Shawn Judge; Robert Kaplan; Wedgworth, Peggy; McKenna, Elizabeth; mdearman@rgrdlaw.com; SRudman@rgrdlaw.com; brobbins@robbinsarroyo.com; gaguilar@robbinsarroyo.com; mnicoud@robbinsarroyo.com; Asciolla, Gregory S.; Morrison, Brian; McDonald, Christopher; Matthew McCahill; Aaron Schwartz; bailey@ruppbaase.com; rupp@ruppbaase.com; cercone@ruppbaase.com; mmiller@millerlawllc.com; Jon Cuneo; Joel Davidow; Jennifer Kelly; Evelyn Li; sraiter@larsonking.com; Mike Roberts; pelbert@nealharwell.com; Barrett, Charles; baaron@nealharwell.com; jcecchi@carellabyrne.com; Itaylor@carellabyrne.com; Rado, Andrei; lbellavia@dealerlaw.com; smalone@dealerlaw.com; Gregory M. Travalio; ehg@classlawgroup.com; mls@classlawgroup.com; ab@classlawgroup.com; jeffwagoner@wagonergroup.com; dpeel@me.com; ppeel@farris-law.com; rac@cliffordlaw.com; smm@cliffordlaw.com; ksr@cliffordlaw.com; aszot@millerlawllc.com; lfanning@millerlawllc.com; mvantine@millerlawllc.com; kboychuck@millerlawllc.com; Robert J. Wozniak; Jim Barz; Xan Bernay; Frank Richter; Jana Law; Michael J. Freed; Douglas A. Millen; jgrabar@grabarlaw.com; Marc Edelson (medelson@edelson-law.com); Prendergast, Richard J.; Layden, Mike T.; jgregor@gklaw.com; cbruck@rjpltd.com; Elana Katcher; Mark H. Troutman; Kenneth Wexler; Bethany Turke; Michelle Looby; David Goodwin; Dan Nordin; Vicky Romanenko; Slidders, Charles  
**Cc:** Ho, Derek T.; Dorris, Daniel V.; Hafenbrack, Joshua  
**Subject:** RE: Authenticom Discovery  
**Date:** Tuesday, March 20, 2018 7:51:22 PM

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Dear All,

Please find attached the key discovery correspondence between us and counsel for CDK and Reynolds regarding their responses to Authenticom's document requests. I have already sent (1) Authenticom's document requests; (2) CDK's and Reynolds' formal responses; and (3) the set of search terms that CDK and Reynolds have agreed to run and for which document custodians. With the attached correspondence, this should complete what you need to understand the discovery positions Defendants have taken, what they've agreed to produce, where we've struck compromises, and where there are still open disputes.

We would of course be willing to answer any questions you may have. Importantly, this should help whoever is appointed as interim dealer class counsel to formulate any necessary follow-up discovery requests.

Thanks and best regards,

Mike

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**From:** Nemelka, Michael N.  
**Sent:** Tuesday, March 20, 2018 2:09 PM  
**To:** Dan Hedlund; Shawn Judge; Robert Kaplan; Wedgworth, Peggy; McKenna, Elizabeth; mdearman@rgrdlaw.com; SRudman@rgrdlaw.com; brobbins@robbinsarroyo.com; gaguilar@robbinsarroyo.com; mnicoud@robbinsarroyo.com; Asciolla, Gregory S.; Morrison, Brian; McDonald, Christopher; Matthew McCahill; Aaron Schwartz; bailey@ruppbaase.com; rupp@ruppbaase.com; cercone@ruppbaase.com; mmiller@millerlawllc.com; Jon Cuneo; Joel Davidow; Jennifer Kelly; Evelyn Li; sraiter@larsonking.com; Mike Roberts; pelbert@nealharwell.com; Barrett, Charles; baaron@nealharwell.com; jcecchi@carellabyrne.com; Itaylor@carellabyrne.com; Rado, Andrei; lbellavia@dealerlaw.com; smalone@dealerlaw.com; Gregory M. Travalio; ehg@classlawgroup.com; mls@classlawgroup.com; ab@classlawgroup.com; jeffwagoner@wagonergroup.com; dpeel@me.com; ppeel@farris-law.com; rac@cliffordlaw.com; smm@cliffordlaw.com; ksr@cliffordlaw.com; aszot@millerlawllc.com; lfanning@millerlawllc.com; mvantine@millerlawllc.com; kboychuck@millerlawllc.com; Robert J. Wozniak; Jim Barz; Xan Bernay; Frank Richter; Jana Law; Michael J. Freed; Douglas A. Millen; jgrabar@grabarlaw.com; Marc Edelson (medelson@edelson-law.com); Prendergast, Richard J.; Layden, Mike T.; jgregor@gklaw.com; cbruck@rjpltd.com; Elana Katcher; Mark H. Troutman; Kenneth Wexler; Bethany Turke; Michelle Looby; David Goodwin; Dan Nordin; Vicky Romanenko; Slidders, Charles  
**Cc:** Ho, Derek T.; Dorris, Daniel V.; Hafenbrack, Joshua  
**Subject:** Re: Authenticom Discovery

Dear All,

Today, the FTC voted to sue to block CDK from acquiring Auto/Mate. As a result, CDK is abandoning the acquisition. The press release is below. I wanted to make sure everyone had

the benefit of this good news.

[https://www.ftc.gov/news-events/press-releases/2018/03/ftc-challenges-cdk-global-incs-proposed-acquisition-competitor?utm\\_source=govdelivery](https://www.ftc.gov/news-events/press-releases/2018/03/ftc-challenges-cdk-global-incs-proposed-acquisition-competitor?utm_source=govdelivery)

Thanks,  
Mike

On Mar 19, 2018, at 1:05 PM, Nemelka, Michael N. <[mnemelka@kellogghansen.com](mailto:mnemelka@kellogghansen.com)> wrote:

Dear Counsel – Please find attached the search terms that CDK and Reynolds have, respectively, agreed to use for their review of custodial documents. I'm also attaching the correspondence from December 2017 confirming these terms.

Thank you,

Mike

**Reynolds**

**CDK**

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**From:** Nemelka, Michael N.

**Sent:** Monday, March 19, 2018 12:48 PM

**To:** 'Dan Hedlund'; 'Shawn Judge'; 'Robert Kaplan'; Wedgworth, Peggy; McKenna, Elizabeth; '[mdearman@grdlaw.com](mailto:mdearman@grdlaw.com)'; '[SRudman@grdlaw.com](mailto:SRudman@grdlaw.com)'; '[brobbins@robbinsarroyo.com](mailto:brobbins@robbinsarroyo.com)'; '[gaguilar@robbinsarroyo.com](mailto:gaguilar@robbinsarroyo.com)'; '[mnicoud@robbinsarroyo.com](mailto:mnicoud@robbinsarroyo.com)'; 'Asciolla, Gregory S.'; 'Morrison, Brian'; 'McDonald, Christopher'; 'Matthew McCahill'; 'Aaron Schwartz'; '[bailey@ruppbaase.com](mailto:bailey@ruppbaase.com)'; '[rupp@ruppbaase.com](mailto:rupp@ruppbaase.com)'; '[cercone@ruppbaase.com](mailto:cercone@ruppbaase.com)'; '[mmiller@millerllc.com](mailto:mmiller@millerllc.com)'; Jon Cuneo; Joel Davidow; Jennifer Kelly; Evelyn Li; '[sraiter@larsonking.com](mailto:sraiter@larsonking.com)'; 'Mike Roberts'; '[pelbert@nealharwell.com](mailto:pelbert@nealharwell.com)'; Barrett, Charles; '[baaron@nealharwell.com](mailto:baaron@nealharwell.com)'; '[jcecchi@carellabyrne.com](mailto:jcecchi@carellabyrne.com)'; '[ltaylor@carellabyrne.com](mailto:ltaylor@carellabyrne.com)'; Rado, Andrei; '[lbellavia@dealerlaw.com](mailto:lbellavia@dealerlaw.com)'; '[smalone@dealerlaw.com](mailto:smalone@dealerlaw.com)'; 'Gregory M. Travalio'; '[ehg@classlawgroup.com](mailto:ehg@classlawgroup.com)'; '[mls@classlawgroup.com](mailto:mls@classlawgroup.com)'; '[ab@classlawgroup.com](mailto:ab@classlawgroup.com)'; '[jeffwagoner@wagonergroup.com](mailto:jeffwagoner@wagonergroup.com)'; '[dpeel@me.com](mailto:dpeel@me.com)'; '[ppeel@farris-law.com](mailto:ppeel@farris-law.com)'; '[rac@cliffordlaw.com](mailto:rac@cliffordlaw.com)'; '[smm@cliffordlaw.com](mailto:smm@cliffordlaw.com)'; '[ksr@cliffordlaw.com](mailto:ksr@cliffordlaw.com)'; '[aszot@millerllc.com](mailto:aszot@millerllc.com)'; '[lfanning@millerllc.com](mailto:lfanning@millerllc.com)'; '[mvantine@millerllc.com](mailto:mvantine@millerllc.com)'; '[kboychuck@millerllc.com](mailto:kboychuck@millerllc.com)'; 'Robert J. Wozniak'; 'Jim Barz'; 'Xan Bernay'; 'Frank Richter'; 'Jana Law'; 'Michael J. Freed'; 'Douglas A. Millen'; '[jgrabar@grabarlaw.com](mailto:jgrabar@grabarlaw.com)'; 'Marc Edelson ([medelson@edelson-law.com](mailto:medelson@edelson-law.com))'; Prendergast, Richard J.; Layden, Mike T.; '[jgregor@gklaw.com](mailto:jgregor@gklaw.com)'; '[cbruck@rjpltd.com](mailto:cbruck@rjpltd.com)'; 'Elana Katcher'; 'Mark H. Troutman'; 'Kenneth Wexler'; 'Bethany Turke'; 'Michelle Looby'; 'David Goodwin'; 'Dan Nordin'; 'Vicky Romanenko'; Slidders, Charles

**Cc:** Ho, Derek T.; Dorris, Daniel V.; Hafenbrack, Joshua; '[JGregor@gklaw.com](mailto:JGregor@gklaw.com)'; Prendergast, Richard J.

**Subject:** Authenticom Discovery

Dear All,

As I mentioned to some of you, I am preparing for you the discovery requests, responses, and correspondence in Authenticom so that you can see the comprehensive RFPs that Authenticom has served, what Defendants have agreed to produce, where we have struck compromises, and the areas where we have dispute. This will hopefully help dealer counsel evaluate and formulate any additional discovery requests on behalf of the putative dealer class, as well as aid our coordination on document discovery issues.

To help start your review, please find attached here (1) the parties' initial disclosures; (2) our document requests to CDK and Reynolds; (3) Defendants' responses to those document requests; and (4) our 30(b)(6) deposition notices to CDK and Reynolds.

We are compiling the relevant discovery correspondence so that you can see

specifically what CDK/Rey have agreed to produce, and where we have struck compromises. We will also send you the search terms they have agreed to use so that you can review those. The custodians they have agreed to are listed in my latest letter that was attached to Defendants' motion for clarification.

I'd be happy to answer any questions you may have.

Thanks,

Mike

**Initial Disclosures**

<< File: 1900156\_1 2017 08 31 CDK Initial Disclosures.PDF >> << File: 1900155\_1 2017 08 31 Reynolds Initial Disclosures.PDF >> << File: 1900153\_1 2017 08 31 Authenticom Initial Disclosures.PDF >>

**RFPs**

<< File: 1916825\_1 2017 10 02 Authenticom First Set of RFP to Reynolds.pdf >> << File: 1916826\_1 2017 10 02 Authenticom First Set of RFP to CDK.PDF >>

**CDK and Reynolds Responses to RFPs**

<< File: 1932603\_1 2017 11 01 Reynolds Responses to Authenticom First Set of RFP.PDF >> << File: 1932602\_1 2017 11 01 CDK Responses to Authenticom First Set of RFP.PDF >>

**30b6 Notices to CDK and Reynolds**

<< File: 1972908\_1 2018 01 10 Authenticom 30b6 Notice of Deposition to CDK.PDF >>  
<< File: 1972909\_1 2018 01 10 Authenticom 30b6 Notice of Deposition to Reynolds.pdf >>

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<2008692\_2 2017 12 24 Final Reynolds ESI Search Terms.docx>

<1971027\_1 2018 01 04 Email from M Provance to BLR re CDK Search Term Mod....pdf>

<1964261\_1 2017 12 19 Emails btwn BLR and M Provance re Additional Propos....pdf>

<2008691\_2 2018 01 04 Final CDK ESI Search Terms.docx>

<1968016\_1 2017 12 22 - 12 24 Emails btwn BLR and B Ross re Outstanding I....pdf>